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*Attorneys for Plaintiff,*  
Universal Life Church Monastery

**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

UNIVERSAL LIFE CHURCH  
MONASTERY a/k/a UNIVERSAL LIFE  
CHURCH,

Plaintiff,

vs.

CLARK COUNTY, NEVADA; LYNN  
MARIE GOYA (in her official capacity as  
Clark County Clerk); STEVE WOLFSON  
(in his official capacity as the Clark County  
District Attorney); JANE DOE; JOHN ROE;  
and JANE POE,

Defendants.

Case No.: 2:18-cv-02099-RFB-BNW

**STIPULATION TO ENGAGE IN  
SETTLEMENT CONFERENCE  
THROUGH COURT'S ALTERNATIVE  
METHOD OF DISPUTE RESOLUTION  
PROGRAM AND TO EXTEND  
DEADLINE TO FILE PRETRIAL ORDER  
(First Request)<sup>1</sup>**

Pursuant to LR IA 6-1, LR 16-5, and LR 26-3, Plaintiff Universal Life Church Monastery a/k/a Universal Life Church and the Clark County Defendants (the "Parties"), stipulate and request that this Court set this case for settlement conference pursuant to the Court's alternative method of dispute

<sup>1</sup> This is the parties' first request for a settlement conference pursuant to the Court's ADR program. They have previously filed one request for an extension of the deadline to file a Joint Pretrial Order (Doc. No. 66) and three requests to extend the discovery period (Doc. Nos. 14, 21, and 29).

1 resolution (“ADR”) program at the earliest opportunity and, in the event that the case does not settle  
2 during the settlement conference, extend the current deadline to file the joint pretrial order (“JPTO”)  
3 until ten days after the completion of the settlement conference.

4 In support of this Stipulation and Request, the Parties state as follows:

5 **1.0 Basis of Requested Extension**

6 Discovery in this case has closed, and the Court issued an order resolving the Parties’ cross  
7 motions for summary judgment on September 19, 2021 (Doc. No. 65). This Order provided that the  
8 JPTO is due on October 1, 2021. The Court subsequently extended that deadline to October 19, 2021  
9 (Doc. No. 67). During a telephonic conference on October 13, 2021, counsel for both parties expressed  
10 a sincere belief that their clients could likely reach an amicable settlement of this case with the  
11 assistance of a magistrate judge to help them work through the remaining issues. As such, they agreed  
12 to ask the Court to schedule a settlement conference pursuant to its ADR program at the earliest  
13 possible opportunity and to extend the date to file a JPTO until ten days following the conclusion of  
14 the settlement conference in the unlikely event that it is unsuccessful.

15 LR 26-3 provides that a stipulation to extend a deadline set by a discovery plan, scheduling  
16 order, or other order must be received no later than 21 days before the expiration of the subject  
17 deadline. There is, however, good cause to grant this stipulation despite being filed fewer than 21 days  
18 before the deadline for the JPTO. During the telephone conference between counsel for the parties on  
19 October 13, 2021, counsel mutually agreed that their clients could likely resolve their remaining issues  
20 with the assistance of a settlement conference pursuant to this Court’s ADR program, which would  
21 obviate the need for a trial, be more cost and time effective, and significantly lessen the burden on this  
22 Court.

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**2.0 Proposed Schedule**

**2.1 Motions in Limine/Daubert Motions**

Under LR 16-3(a), any motions in limine, including Daubert type motions, shall be filed and served 30 days prior to the commencement of trial and oppositions shall be filed and served 15 days thereafter. Reply briefs will only be allowed with leave of the Court.

**2.2 Scheduling Settlement Conference**

The Parties request that this Court order a settlement conference pursuant to this Court's ADR program at the earliest possible opportunity.

**2.3 Deadline for Joint Pretrial Order**

Pursuant to LR 26-1(b)(5) and the Court's Order dated September 24, 2021 (Doc. No. 67), the Joint Pretrial Order shall be filed no later than October 19, 2021. The parties request that this Court extend the deadline to file the JPTO until ten days following the settlement conference in the unlikely event that the case is not fully resolved at the conclusion of the settlement conference. The disclosures required by Fed. R. Civ. P. 26(a)(3) and any objections shall be included in the final pretrial order and must be filed at least 30 days prior to trial in accordance with FRCP 26(a)(3)(B).

IT IS SO STIPULATED:

Dated: October 13, 2021

/s/ Ronald D. Green

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Dated: October 13, 2021

/s/ Thomas Dillard, Jr.

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*Attorney for Defendants,*  
 Clark County, Lynn Marie Goya, and Steve Wolfson  
 (in their official capacities)

1  
2 IT IS SO ORDERED.  
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6 **RICHARD E. BOULWARE, II**  
7 **United States District Court**

8 DATED this 16th day of October, 2021.  
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